BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA



Application of Southern California Edison)	
Company (U 338-E) for Approval of the Results)	A14110A6plication No. 14-11-XXX
of Its 2013 Local Capacity Requirements Request)	
for Offers for the Moorpark Sub-Area.)	

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) APPLICATION FOR APPROVAL OF THE RESULTS OF ITS 2013 LOCAL CAPACITY REQUIREMENTS REQUEST FOR OFFERS FOR THE MOORPARK SUB-AREA

WILLIAM V. WALSH TRISTAN REYES CLOSE

Attorneys for SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue Post Office Box 800 Rosemead, California 91770

Telephone: (626) 302-2883 Facsimile: (626) 302-6962

E-mail: Tristan.ReyesClose@sce.com

Dated: November 26, 2014

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Southern California Edison)	
Company (U 338-E) for Approval of the Results)	Application No. 14-11-XXX
of Its 2013 Local Capacity Requirements Request)	
for Offers for the Moorpark Sub-Area.)	

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) APPLICATION FOR APPROVAL OF THE RESULTS OF ITS 2013 LOCAL CAPACITY REQUIREMENTS REQUEST FOR OFFERS FOR THE MOORPARK SUB-AREA

Pursuant to Rules 1 and 2 of the California Public Utilities Commission's ("Commission" or "CPUC") Rules of Practice and Procedure, Sections 701 and 702 of the Public Utilities Code, and Decision ("D.") 13-02-015, Southern California Edison Company ("SCE") submits this Application for Approval of the results of its 2013 Local Capacity Requirements ("LCR") Request for Offers ("RFO) ("Application") for the Moorpark sub-area. SCE's filing consists of this Application. Concurrently with the filing of this Application, SCE is serving Testimony in support of this Application ("Exhibit SCE-1") and Appendices ("Exhibit SCE-2" and "Exhibit SCE-3").

I.

INTRODUCTION

On February 13, 2013, the Commission issued D.13-02-015 ("Track 1 decision") in the Long Term Procurement Plan ("LTPP") proceeding. The Track 1 decision ordered SCE to procure between 215 and 290 Megawatts ("MW") of electrical capacity in the Moorpark sub-area of the Big Creek/Ventura local reliability area to meet long-term local capacity requirements by 2021, largely due to the expected retirement of once-through-cooling ("OTC") generation facilities.²

¹ D.13-02-015 at 135 (Ordering Paragraph ("OP") 11).

D.13-02-015 at 131 (Ordering Paragraph ("OP") 2). D.13-02-015 also authorized SCE to procure between 1900- 2500 MW of electric capacity to meet local capacity requirements in the West Los Angeles sub-area of the Los Angeles basin local reliability area. D.13-02-015 at 130-131 (OP 1); D.14-03-004 ("Track 4 Continued on the next page"

The Track 1 decision also ordered SCE to file an LCR procurement plan ("LCR Procurement Plan"). SCE filed its LCR Procurement Plan on July 15, 2013. In accordance with the Track 1 decision, Energy Division reviewed SCE's LCR Procurement Plan and requested that SCE submit a modified LCR Procurement Plan with additional information. SCE filed its final modified LCR Procurement Plan on August 30, 2013. Energy Division approved SCE's modified LCR Procurement Plan on September 4, 2013. SCE launched its LCR RFO on September 12, 2013.

On March 13, 2014, the Commission issued D.14-03-004 ("Track 4 decision") in the LTPP proceeding, authorizing SCE to procure additional MW in the Western Los Angeles Basin. The Track 4 decision did not address or change the authorized procurement for the Moorpark sub-area.⁴

The Track 1 decision also ordered SCE to file an application for approval of all contracts entered into as a result of the procurement process for new capacity in the Moorpark sub-area. SCE files this application ("Application") in accordance with the Track 1 decision.

II.

SUMMARY OF REQUEST

SCE requests Commission approval of 11 contracts selected through the LCR RFO process for the Moorpark sub-area. A summary of the selected offers is provided in the table below.

Continued from the previous page

decision") at 141-143 (OP 1). The Commission required SCE to file a separate Application for approval of contracts for the Western LA Basin. D.13-02-015 at 135 (OP 11). See A.14-11-012 for the Western LA Basin Application and supporting Testimony.

 $[\]frac{3}{2}$ Id. at 133-134 (OP 5-7).

⁴ D.14-03-004 at 141-143 (OP 1).

 $^{^{5}}$ D.13-02-015 at 135 (OP 11).

Product Category	Counterparty	Total Contracts	Max Quantity (LCR MW)
GFG	 NRG Energy Center Oxnard LLC NRG California South LP 	2	262.00 ⁶
EE	Onsite Energy Corporation	6	6.00
Renewable DG	 Solar Star California XXXIV, LLC Solar Star California XXXIX, LLC 	2	5.66
ES (IFOM)	NRG California South LP	1	0.50
	Total LCR MW	11	274.16

SCE respectfully requests that the Commission approve the LCR RFO, SCE's conduct with respect to the LCR RFO, and the contracts selected through the LCR RFO process for the Moorpark sub-area as prudent and reasonable.

SCE also requests that the Commission order SCE to establish the LCR Products Balancing Account ("LCRPBA"). The LCRPBA is necessary to appropriately account for the costs of the contracts selected through the LCR RFO for the Moorpark sub-area and to ensure that customers only pay the assessed net cost of the resources procured through the LCR RFO.

III.

ORGANIZATION OF SCE'S TESTIMONY

Exhibit SCE-01, "Testimony of Southern California Edison Company on the Results of Its 2013 Local Capacity Requirements Request for Offers (LCR RFO) for the Moorpark Sub-Area," is organized in a single volume with nine chapters as follows:

SCE is also seeking approval of the 54 MW Ellwood Refurbishment project. The Ellwood Refurbishment project will not count towards SCE's LCR MW authorization because it was included as an existing resource in the CAISO studies for LCR need. Thus, the refurbishment of the project is not considered an incremental resource and does not count toward the procurement targets for the Moorpark sub-area. For more detail on NRG's Ellwood Refurbishment project see Exhibit SCE-1, Testimony of Southern California Edison Company on the Results of Its 2013 Local Capacity Requirements Request for Offers (LCR RFO) for the Moorpark Sub-Area, Chapter VII, Section A.1.

Chapter 1 Introduction

Chapter 2 LCR RFO Background

Chapter 3 Basis for Establishing LCR Procurement Need

Chapter 4 LCR RFO Solicitation Process Overview

Chapter 5 LCR RFO Participation

Chapter 6 Valuation Process

Chapter 7 Solicitation Results

Chapter 8 Allocation of Benefits and Costs

Chapter 9 Cost Recovery and Revenue Allocation

Exhibit SCE-02, includes Appendices to SCE's Testimony:

Appendix A: Witness Qualifications (including Confidentiality

Declarations)

Confidential Appendix B: LCR RFO Contracts

Confidential Appendix C: LCR RFO Summary of Selected Offers

Appendix D: Independent Evaluator Report

Exhibit SCE-03, also includes Appendices to SCE's Testimony:

Appendix E: Solicitation Materials

Appendix F: Roadmap of Decision Requirements

IV.

STATUTORY AND PROCEDURAL REQUIREMENTS

A. <u>Statutory and Other Authority</u>

SCE files this Application pursuant to Public Utilities Code sections 701 and 702, the Commission's Rules of Practice and Procedure and Decisions 13-02-015. Specifically, SCE's Application complies with the Commission's Rules of Practice and Procedure 1.5 through 1.11 and 1.13, which specify the procedures for, among other things, filing documents. In addition, this Application complies with Rules 2.1 and 2.2. Rule 2.1 requires that all applications: (1) clearly and concisely state authority or relief sought; (2) cite the statutory or other authority under which that relief is sought; and

⁷ D.13-02-015 at 135 (OP 11).

(3) be verified by the applicant. SCE's Application sets forth the relief sought, the authority for such relief, and has been verified by an SCE officer as provided in Rules 1.11 and 2.1. Rule 2.1 sets forth further requirements that are addressed separately in the sections below.

In particular, as detailed above, Decisions 13-02-015, the LTPP Track 1 decision, requires SCE to file an application with the Commission for approval of all contracts entered into as a result of the procurement process for new capacity in the Moorpark sub-area.

B. <u>Legal Name, Principal Place of Business, and Correspondence or Communications</u>

The legal name of the applicant is Southern California Edison Company. SCE is a corporation organized and existing under the laws of the State of California, and is primarily engaged in the business of generating, purchasing, transmitting, distributing and selling electric energy for light, heat, and power in portions of central and southern California as a public utility subject to the jurisdiction of the Commission. SCE's properties, substantially all of which are located within the State of California, primarily consist of hydroelectric and thermal electric generating plants, together with transmission and distribution lines and other property necessary in connection with its business.

The location of SCE's principal place of business is 2244 Walnut Grove Avenue, Rosemead, California 91770, and its post office address and telephone number are:

Southern California Edison Company Post Office Box 800 Rosemead, California 91770 Telephone: (626) 302-1212

Tristan Reyes Close is the attorney on this matter. Correspondence or communications regarding this Application should be addressed to:

Tristan Reyes Close
Senior Attorney
Southern California Edison Company
2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Talanhara: (626) 202 2882

Telephone: (626) 302-2883 Facsimile: (626) 302-6962

E-mail: <u>Tristan.ReyesClose@sce.com</u>

_

⁸ D.13-02-015 at 135 (OP 11).

To request a copy of this Application, please contact:

Norma Perez, Case Administrator Southern California Edison Company

Post Office Box 800

Rosemead, California 91770 Telephone: (626) 302-6809 Facsimile: (626) 302-3119

E-mail: Case.Admin@sce.com

Categorization, Hearings, Issues to be Considered and Proposed Schedule Pursuant to Rule 2.1(c)

1. **Proposed Category**

SCE proposes that this proceeding be categorized as a "ratesetting" proceeding as defined in Rule 1.3(e) of the Commission's Rules of Practice and Procedure and California Public Utilities Code Section § 1701.1(c)(3). In addition, Rule 7.1(e)(2) provides that if a proceeding does not clearly fit within one of the three established categories, the proceeding generally should be conducted under the rule for ratesetting proceedings.

SCE is not proposing specific rate increases at this time, but is seeking approval of all contracts entered into as a result of the LCR RFO for the Moorpark sub-area, including cost recovery for those contracts. SCE proposes to include in its annual Energy Resource Recovery Account ("ERRA") Forecast proceeding a forecast of the costs of the resources procured through the LCR RFO to be included in rates for the following year. The costs of the LCR resources that will be included in rates will be trued-up to their actual recorded costs through balancing accounts.

2. Need for Hearings

SCE's Application and supporting Testimony and appendices submitted herewith contain sufficient information and constitute a sufficient record for the Commission to rule on SCE's Application without the need for evidentiary hearings. SCE believes that all interested parties can comment and express their views in writing through protests and comments. Although SCE does not foresee a need for hearings, SCE proposes two procedural schedules, one that includes evidentiary hearings and one that does not. Ultimately, the need for hearings will be determined by the assigned administrative law judge.

3. Proposed Schedule

SCE proposes the following schedules for this proceeding (one with hearings and one without), which meet the requirements of Rules 2.1(c) and 2.6 to resolve ratesetting proceedings within 18 months:

Schedule Without Evidentiary Hearings

Application Filed	November 26, 2014
Daily Calendar Notice Appears	December 1, 2014
Protests and Responses Due	December 31, 2014
Reply to Protests and Responses Due	January 12, 2015
Prehearing Conference	January 21, 2015
Proposed Decision Mailed	April 21, 2015
Comments on Proposed Decision Due	May 11, 2015
Reply Comments Due	May 18, 2015
Commission Issues Final Decision	June 8, 2015

Schedule With Evidentiary Hearings

Application Filed	November 26, 2014
Daily Calendar Notice Appears	December 1, 2014
Protests and Responses Due	December 31, 2014
Reply to Protests and Responses Due	January 12, 2015
Prehearing Conference	January 21, 2015
Intervenor Testimony Due	February 2, 2015
Rebuttal Testimony Due	March 2, 2015
Request Evidentiary Hearings	March 2, 2015
Evidentiary Hearings	March 24 – 26, 2015
Concurrent Opening Briefs Due	April 27, 2015

Concurrent Reply Briefs Due	May 18, 2015
Proposed Decision Mailed	August 18, 2015
Comments on Proposed Decision Due	September 7, 2015
Reply Comments Due	September 14, 2015
Commission Issues Final Decision	October 5, 2015

1. <u>Issues to be Considered</u>

The issues to be considered in connection with this Application are specified in SCE's Testimony, the Summary of SCE's Request in Section II above, and the Prayer for Relief set forth in Section V below.

D. <u>Organization, Qualification to Transact Business and Articles of Incorporation Pursuant to Rule 2.2</u>

A copy of SCE's Certificate of Restated Articles of Incorporation, effective on March 2, 2006, and presently in effect, certified by the California Secretary of State, was filed with the Commission on March 14, 2006, in connection with Application No. 06-03-020, and is incorporated herein by this reference pursuant to Rule 2.2 of the Commission's Rules of Practice and Procedure.

A copy of SCE's Certificate of Determination of Preferences of the Series D Preference Stock filed with the California Secretary of State on March 7, 2011, and presently in effect, certified by the California Secretary of State, was filed with the Commission on April 1, 2011, in connection with Application No. 11-04-001, and is by reference made a part hereof.

A copy of SCE's Certificate of Determination of Preferences of the Series E Preference Stock filed with the California Secretary of State on January 12, 2012, and a copy of SCE's Certificate of Increase of Authorized Shares of the Series E Preference Stock filed with the California Secretary of State on January 31, 2012, and presently in effect, certified by the California Secretary of State, were filed with the Commission on March 5, 2012, in connection with Application No. 12-03-004, and are by reference made a part hereof.

A copy of SCE's Certificate of Determination of Preferences of the Series F Preference Stock filed with the California Secretary of State on May 5, 2012, and presently in effect, certified by the California Secretary of State, was filed with the Commission on June 29, 2012, in connection with Application No. 12-06-017, and is by reference made a part hereof.

A copy of SCE's Certificate of Determination of Preferences of the Series G Preference Stock filed with the California Secretary of State on January 24, 2013, and presently in effect, certified by the California Secretary of State, was filed with the Commission on January 31, 2013, in connection with Application No. 13-01-016, and is by reference made a part hereof.

A copy of SCE's Certificate of Determination of Preferences of the Series H Preference Stock filed with the California Secretary of State on February 28, 2014, and presently in effect, certified by the California Secretary of State, was filed with the Commission on March 24, 2014, in connection with Application No. 14-03-013, and is by reference made a part hereof.

Certain classes and series of SCE's capital stock are listed on a "national securities exchange" as defined in the Securities Exchange Act of 1934 and copies of SCE's latest Annual Report to Shareholders and its latest proxy statement sent to its stockholders has been filed with the Commission with a letter of transmittal dated March 14, 2014, pursuant to General Order Nos. 65-A and 104-A of the Commission.

E. Requirements That Are Not Applicable

Because this Application does not request authority to increase rates and only seeks approval of the contracts selected through the LCR RFO for the Moorpark sub-area, the requirements of 3.2(a)(1)-(5), (7)-(8), (10) and 3.2(b)-(e) of the Commission's Rules of Practice and Procedure are not applicable.

F. Index of Exhibits and Appendices to This Application

SCE's submissions in support of this Application include the following, which are incorporated herein by reference:

Exhibits to Application

Testimony of Southern California Edison

Company in Support of Its Application for

Exhibit SCE-1 Approval of Results of Its 2014 Local

Capacity Requirements Request for Offers in

Moorpark

Exhibit SCE-2 Appendices in support of Testimony

Exhibit SCE-3 Appendices in support of Testimony

G. Service List

The official service list has not yet been established in this proceeding. SCE is serving this Application and supporting Testimony on the service list established by the Commission for R.12-03-014 and R.13-12-010. SCE has also served a copy of this Application and its supporting testimony on the Commission.

V.

PRAYER FOR RELIEF

SCE respectfully requests that the Commission:

- 1. Grant expedited consideration of this Application, as the terms of the LCR RFO contracts are conditioned on the occurrence of final "CPUC Approval," as it is described in the LCR RFO contracts;
- 2. Approve the Application in its entirety;
- 3. Approve the LCR RFO, and SCE's conduct with respect to the LCR RFO, as reasonable;
- 4. Approve the LCR RFO contracts in their entirety;
- 5. Find that the contracts, totaling 274.16 MW, entered into as a result of the LCR RFO for the Moorpark sub-area are needed to meet long-term local capacity requirements and satisfy the 215 MW minimum procurement authorization for the Moorpark sub-area established in D.13-02-015;⁹
- 6. Find that the LCR RFO contracts are compliant with the Emissions Performance Standard;

⁹ D.13-02-015 at 130-131 (OP 1.a).

- 7. Find the LCR RFO contracts, and SCE's entry into them, reasonable and prudent for all purposes, and find that any payments to be made by SCE pursuant to the contracts are recoverable in full by SCE through the ERRA proceeding, subject only to SCE's prudent administration of the contracts;
- 8. Authorize SCE to allocate the benefits and costs of the contracts entered into as a result of the LCR RFO to all benefitting customers in accordance with D.13-02-015 and D.14-03-004;
- 9. Approve SCE's plan for the allocation of costs and benefits to all benefitting customers set forth in Chapter 8 of Exhibit SCE-1;
- 10. Order SCE to establish the LCR Products Balancing Account; and
- 11. Grant such other and further relief as the Commission finds just and reasonable.

Respectfully submitted,

WILLIAM V. WALSH TRISTAN REYES CLOSE

/s/ Tristan Reyes Close

By: Tristan Reyes Close

Attorneys for SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue

Post Office Box 800

Rosemead, California 91770

Telephone: (626) 302-2883

Facsimile: (626) 302-6962

E-mail: Tristan.ReyesClose@sce.com

November 26, 2014

VERIFICATION

I am an officer of the applicant corporation herein and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing document are true.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 17th day of November 2014, at Rosemead, California.

/s/ Colin Cushnie

By: Colin Cushnie Vice President, Vice President, Energy Procurement & Management SOUTHERN CALIFORNIA EDISON COMPANY 2244 Walnut Grove Avenue Post Office Box 800 Rosemead, California 91770